

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Nathan A. Robertson, being first duly sworn, hereby depose and state as follows:

1. Your Affiant, Nathan A. Robertson, has been a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since November of 2019. Your Affiant is currently assigned to the Newport News Satellite Office of the Norfolk Field Office and charged with investigating violations of federal firearms, explosives, and arson laws, and other offenses enumerated in Title 18, Title 21, and Title 26 of the United States Code. As such, your Affiant is an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7). That is, your Affiant is an officer of the United States, who is empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests of the offenses enumerated in Title 18, Title 21, and Title 26 of the United States Code.

2. Your Affiant is also a Hampton Police Officer and has been so employed since September of 2009. In December of 2014, your Affiant joined the Hampton Police Division's (HPD) Special Investigations Unit. In that capacity, your Affiant conducted multiple street level narcotics and firearms investigations, concerning the distribution of controlled substances and the use of firearms. Your Affiant served in that capacity until December of 2017 and has served the Hampton Police Division in several other assignments prior to serving in the capacity of an ATF Task Force Officer.

3. This affidavit contains only enough information to establish probable cause and does not contain all the facts or information known to law enforcement.

PROBABLE CAUSE IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT

4. On April 26, 2022, members of the Hampton Police Division (HPD) received a call from a female who wished to remain anonymous. The female caller identified Michael Shurard JACKSON, date of birth xx/xx/1990, as having several active felony warrants on file and driving a 2013 red Nissan Rogue sport utility vehicle (SUV) displaying Virginia (VA) registration plates xxx-8056. Members of HPD located this vehicle traveling and surveilled the vehicle to the parking lot of the Auto Zone, located a 2 Auto Zone Way in the City of Hampton, VA. This location is in the Eastern District of Virginia (EDVA).

5. Prior to making contact, members of HPD verified that JACKSON had several active felony warrants on file, to include a Felony Failure to Appear warrant out of Hampton, VA, on an underlying charge of Assault and Battery on a Family Member – Strangulation.

6. Members of HPD observed JACKSON exited the driver's door of the vehicle and enter the business. Shortly thereafter, JACKSON was observed exiting the business and re-entering the Nissan Rogue SUV. Members of HPD approached JACKSON and detained him without further incident.

7. After JACKSON was removed from the vehicle, Senior Police Officer (SPO) Vandenberg observed what appeared to be a semi-automatic firearm in between the driver's seat and center console. The firearm in between the driver's seat and center console was recovered by SPO Vandenberg and determined to be a MAKE: Ruger MODEL: SR9 CAL: 9mm, SN: 338-

07254 semi-automatic pistol with a magazine and eighteen (18) 9mm cartridges. SPO Vandenburg also observed a small quantity of suspected methamphetamine in a small dish on top of the center console. Based on observing both the firearm and suspected methamphetamines in plain view, SPO Vandenberg conducted an additional search of the vehicle and located several other items. In a bag on the front passenger seat floorboard SPO Vandenberg located the following: approximately 50 grams of suspected methamphetamine and packaging material(s), approximately 8 grams of suspected cocaine and packaging material(s), approximately 15 grams of suspected cocaine base and packaging material(s), less than one ounce of suspected marijuana, digital scales, smoking devices with an unknown residue and a purple in color “3D printed ghost gun” lower receiver with a MAKE: Smith & Wesson MODEL: SW9VE CAL: 9mm upper receiver and a magazine with (10) 9mm cartridges.

8. The semi-automatic firearm with a “3D printed ghost gun” lower receiver and a MAKE: Smith & Wesson MODEL: SW9VE CAL: 9mm upper-receiver did not have an observable serial number plate on the weapon’s lower receiver.

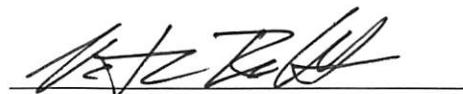
9. In other locations within the passenger compartment of the vehicle SPO Vandenberg located two cellular telephones, apart from the cellular telephone that was located on JACKSON’s person. In the vehicle’s trunk SPO Vandenberg located a 50 round “drum” magazine with (45) 9mm cartridges contained inside.

10. After being placed under arrest for his outstanding felony warrant(s), JACKSON was transported to HPD headquarters located at 40 Lincoln Street and was placed in an interview room. JACKSON was advised of his *Miranda* rights by your affiant and agreed to speak with your affiant. During the interview, along with other statements, JACKSON admitted to being a distributor of methamphetamine. JACKSON admitted to utilizing a firearm to protect his illegal

narcotics proceeds and product and needing a firearm so that he did not get "ripped off." JACKSON stated that the aforementioned purple in color "3D printed ghost gun" lower receiver was obtained by JACKSON from an individual known to him to illegally manufacture firearm lower receivers using a 3D printing device. JACKSON admitted to conspiring with other known and unknown distributors of illegal narcotics in the Hampton, VA area.

CONCLUSION

Based on the foregoing, your Affiant believes probable cause exists to charge JACKSON ~~Possession with Intent to Distribute~~ ^{MR RJL} with the following offenses: ~~Distribution of a~~ Quantity of Methamphetamine, in violation of Title 21, U.S.C. 841(a)(1) and Possession of a Firearm in Furtherance of Drug Trafficking, in violation of Title 18, U.S.C. 924(C).



Nathan A. Robertson
Task Force Officer
United States Bureau of Alcohol, Tobacco,
Firearms and Explosives

Read and Approved:


Amy E. Cross
Special Assistant United States Attorney

Sworn and subscribed to me
On this 27th day of April, 2022


United States Magistrate Judge
Norfolk, Virginia